

**MELLINGER, SANDERS & KARTZMAN, LLC**

101 Gibraltar Drive, Suite 2F

Morris Plains, New Jersey 07950

By: Steven P. Kartzman, Esq. (SPK 5289)

(973) 267-0220

*Attorneys for Trustee, Steven P. Kartzman*

In Re:

**MADELYN GRAFFIA,**

Debtor.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

CHAPTER 7

CASE NO. 10-50203 TBA

**APPLICATION TO EMPLOY ATTORNEY  
FOR TRUSTEE PURSUANT TO 11 U.S.C.  
§327(d)**

COMES NOW Steven P. Kartzman, Trustee in the above-stated case, and shows the court as follows:

1. That the Trustee desires to employ his firm as the attorneys for the Trustee in this case.

2. Steven P. Kartzman is admitted to practice in the U.S. Bankruptcy Court since December 1978 and is familiar and knowledgeable in the Bankruptcy Code, Bankruptcy Rules of Practice, local rules and Federal Rules of Evidence, has knowledge and experience in bankruptcy law practice and is well qualified to represent your petitioner in this case in this Bankruptcy Court.

3. Professional services to be rendered for which it is necessary to retain an attorney are:

a. Negotiate the sale of the property of the Estate;

b. Investigation of facts, analyses of legal positions, and taking of appropriate

action, if required under the Bankruptcy Code, relative to any preference, fraudulent transfer or improper disposition of assets, reclamation; and

- c. Taking of any and all other necessary action incidental to the proper preservation and administration of this estate.

4. Pursuant to 11 U.S.C. §327 (a), the proposed attorney does not hold or represent an interest adverse to the estate and based upon the annexed Certification, is a disinterested person within the meaning of 11 U.S.C. §101 (14). Moreover, pursuant to Bankruptcy Rule 2014 (a), to the best of the applicant's knowledge, the proposed attorney has no connection whatsoever with the debtor, creditors or any other party in interest or their respective attorneys or accountants, the United States Trustee or any person employed in the Office of the United States Trustee, except that Steven P. Kartzman is the Chapter 7 Trustee in this case.

5. My regular and customary hourly rate for legal matters not arising under Title 11, United States Code is \$365.00 per hour and I propose to represent the Trustee on this basis subject to the ultimate approval of my fee application at the conclusion of this case by the Bankruptcy Court. Services rendered by Adam G. Brief will be compensated at the rate of \$295.00 per hour. Services rendered by Nicole Corona will be compensated at the rate of \$225.00 per hour.

6. I certify that I have given Notice to the United States Trustee of the bringing of this Application and Proposed Form of Order by electronically serving a clear copy of same to her office simultaneously with the electronic filing of same with the Clerk of the Court.

7. I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, that I am subject to punishment.

WHEREFORE, applicant prays that he be authorized to retain and appoint Mellinger, Sanders & Kartzman L.L.C. as attorneys for the Trustee in this case pursuant to 11 U.S.C. §327.

/s/ Steven P. Kartzman  
STEVEN P. KARTZMAN

DATED: August 13, 2014